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11 Attorneys for Defendant
12 TOOTSIE ROLL INDUSTRIES, INC.
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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

KETRINA GORDON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

TOOTSIE ROLL INDUSTRIES, INC., and
DOES 1 through 10, inclusive,

Defendants

Civil Case No.: 2:17-cv-02664

**DECLARATION OF ASHLEY
SIMONSEN IN SUPPORT OF
DEFENDANT TOOTSIE ROLL
INDUSTRIES, INC.'S NOTICE OF
REMOVAL OF CIVIL ACTION
FROM STATE COURT**

Complaint filed: February 10, 2017

I, Ashley Simonsen, declare and state as follows:

1. I am an associate at the law firm of Covington & Burling LLP. I am one of the attorneys representing defendant Tootsie Roll Industries, Inc. (“Tootsie Roll”) in the above-captioned suit. I have personal knowledge of the matters stated herein and, if called upon, could competently testify thereto.

2. On February 10, 2017, plaintiff Ketrina Gordon (“Plaintiff”) filed this action in the Superior Court of the State of California, County of Los Angeles. A true and correct copy of the Class Action Complaint (“CAC”) is attached hereto as **Exhibit A**.

3. Tootsie Roll has informed counsel that Plaintiff served the CAC on Tootsie Roll by hand, delivering a copy of the CAC, a Summons, Notices of Case Assignment (for Non-Class Action and Personal Injury Cases), a set of Voluntary Efficient Litigation Stipulations, a Civil Case Cover Sheet, and an Initial Status Conference Order to Tootsie Roll's registered agent for service of process on March 10, 2017. A true and correct copy of the Summons served on Tootsie Roll is attached hereto as **Exhibit B**.

4. A true and correct copy of the Notice of Case Assignment for Non-Class Action Cases served on Tootsie Roll is attached hereto as **Exhibit C**.

5. A true and correct copy of the Notice of Case Assignment for Personal Injury Cases served on Tootsie Roll is attached hereto as **Exhibit D**.

6. A true and correct copy of the set of Voluntary Efficient Litigation Stipulations served on Tootsie Roll is attached hereto as **Exhibit E**.

7. A true and correct copy of the Civil Case Cover Sheet served on Tootsie Roll is attached hereto as **Exhibit F**.

8. A true and correct copy of the Initial Status Conference Order served on Tootsie Roll is attached hereto as **Exhibit G**.

9. In addition, the following document has been entered on the docket in this case in the California Superior Court for the County of Los Angeles: a February 24,

1 2017 Minute Order Regarding Newly Filed Class Action, a true and correct copy of
2 which is attached hereto as **Exhibit H**.

3 10. A true and correct copy of an excerpt from Tootsie Roll's February 27,
4 2017 Form 10-K, stating that Tootsie Roll's state of incorporation is Virginia, is attached
5 hereto as **Exhibit I**. The full 10-K is publicly available at
6 <https://www.sec.gov/Archives/edgar/data/98677/000155837017001046/0001558370-17-001046-index.htm>.
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9 I declare under penalty of perjury under the laws of the State of California
10 that the foregoing is true and correct.
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12 Executed this 7th day of April, 2017, in San Francisco, California.
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14 By: 
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16 Ashley Simonsen
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